

Message

---

**From:** Sanchez, Brian [sanchez.brian@epa.gov]  
**Sent:** 5/30/2017 3:59:26 PM  
**To:** Cirian, Mike [Cirian.Mike@epa.gov]  
**Subject:** RE: CFAC Concrete Sampling Data

Hi Mike,

Thanks for the additional information. I am going to discuss this with a couple more folks. I'll let you know if more comments come up.

Brian

---

**From:** Cirian, Mike  
**Sent:** Thursday, May 25, 2017 9:04 AM  
**To:** Sanchez, Brian <sanchez.brian@epa.gov>; Griffin, Susan <Griffin.Susan@epa.gov>  
**Subject:** RE: CFAC Concrete Sampling Data

Susan and Brian,

Thanks for your quick replies. This is very helpful. In regards to all the comparisons, the community of Aluminum city lies on the edge of their property and there has been a lot of accusations about groundwater causing their well to be contaminated. (which is not the case as those wells are being sampled.) Also the State has been asking for these comparisons and Glencore did not refuse. I'm with you, but if this helps folks get through this without holding up the process any more we can make both sides satisfied.

This concrete rubble is estimated to be about 20% of the back fill material and will have approximately 8-10 feet of cover material over it. They are filling the basements of the pot lines. They will be required to fracture the floors so these areas do not create ponds. We already have groundwater we will need to be dealing with and will be sampling under the structures once completed. There is no way to sample these areas with the structures up at this time.

The company doing the demo has already demolished another Aluminum smelter in Oregon which was almost an exact duplicate of this plant. And they pretty much are repeating their efforts here and to all accounts this worked very well on the other plant.

Again, thanks for your time and input.

Mike

Mike Cirian, PE  
Libby On-site Project Manager  
US EPA  
108 East 9th Street  
Libby, MT 59923  
(406) 293-6194 Office

---

**From:** Sanchez, Brian  
**Sent:** Tuesday, May 23, 2017 3:44 PM  
**To:** Griffin, Susan <Griffin.Susan@epa.gov>; Cirian, Mike <Cirian.Mike@epa.gov>  
**Subject:** RE: CFAC Concrete Sampling Data

Hi Mike,

No real concerns on the ecological side, particularly if adequate soil cover is maintained. Weighted average concentrations of detected contaminants in concrete are also low compared to screening levels that I've looked at.

Brian

---

**From:** Griffin, Susan

**Sent:** Tuesday, May 23, 2017 3:24 PM

**To:** Cirian, Mike <[Cirian.Mike@epa.gov](mailto:Cirian.Mike@epa.gov)>; Sanchez, Brian <[sanchez.brian@epa.gov](mailto:sanchez.brian@epa.gov)>

**Subject:** RE: CFAC Concrete Sampling Data

Hi Mike,

We had a similar situation at Rocky Flats where a number of the buildings were crushed and used as backfill. The backfill was then covered with 6 ft of native soil. The building material had to pass TCLP, could not be a RCRA hazardous material, and had to have only low level radioactivity. While reading the Aluminum Falls report, I'm somewhat confused by all of the comparisons to drinking water, residential soil, and industrial soil levels. Since there is no complete exposure pathway for residential or industrial receptors, I see no need for these comparisons. I think that if they wash the concrete and it passes TCLP or SPLP and is not a RCRA hazardous material, it can be safely used as backfill. A couple of notes from the Rocky Flats sites. They sprayed the concrete with a material that would not allow penetration of water as an extra precaution against leaching before using it as backfill. Also IC's were needed to maintain the soil cover because of runoff events. Mark Aguilar was the RPM at Rocky Flats and would be a good resource (303) 312-6251.

Brian, please weigh in on ecological concerns.

Sincerely,  
Susan

---

**From:** Cirian, Mike

**Sent:** Tuesday, May 23, 2017 10:59 AM

**To:** Sanchez, Brian <[sanchez.brian@epa.gov](mailto:sanchez.brian@epa.gov)>; Griffin, Susan <[Griffin.Susan@epa.gov](mailto:Griffin.Susan@epa.gov)>

**Subject:** FW: CFAC Concrete Sampling Data

Hi Brian and Susan,

I have received this from Roux, Contractor for CFAC. Would you have time to look at this and give me any comments or opinions you may have on their recommendations?

I am going up there tomorrow to look at the area and put my eyes on the areas there are proposing to use this as backfill.

Let me know if you have time and can give me your opinions.

Thanks  
Mike

Mike Cirian, PE  
Libby On-site Project Manager  
US EPA  
108 East 9th Street  
Libby, MT 59923

---

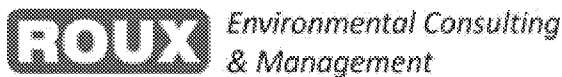
**From:** Michael Ritorto [<mailto:mritorto@rouxinc.com>]  
**Sent:** Friday, May 19, 2017 1:06 PM  
**To:** Cirian, Mike <[Cirian.Mike@epa.gov](mailto:Cirian.Mike@epa.gov)>  
**Cc:** Gunnar Emilsson <[EmilssonGR@cdmsmith.com](mailto:EmilssonGR@cdmsmith.com)>; Andrew Baris <[abaris@rouxinc.com](mailto:abaris@rouxinc.com)>; Laura Jensen <[ljensen@rouxinc.com](mailto:ljensen@rouxinc.com)>; John.Stroiazso@glencore-ca.com; Steve Wright - CFAC <[swright@cfaluminum.com](mailto:swright@cfaluminum.com)>; [lidewitt@mt.gov](mailto:lidewitt@mt.gov); [cowen@mt.gov](mailto:cowen@mt.gov)  
**Subject:** RE: CFAC Concrete Sampling Data

Hello Mike,

Attached you will find a draft letter describing the results of the concrete sampling activities and CFAC's proposed path forward. The letter is in draft form, as we assume we will be discussing the contents prior to finalizing.

Please let us know if you have any questions. Please also let us know when we can discuss. As you know, this is a time sensitive matter for CFAC and the demolition project.

**Michael Ritorto | Principal Hydrogeologist/Office Manager | Roux Associates, Inc.**  
209 Shafter Street, Islandia, NY 11749  
Main: 631-232-2600 | Direct: 631-630-2370  
Email: [mritorto@rouxinc.com](mailto:mritorto@rouxinc.com) | Website: [www.rouxinc.com](http://www.rouxinc.com)



*We solve our clients' most challenging environmental problems*

NOTICE: This electronic communication, including any authorized attachments, contains information that may be legally privileged, protected, confidential and/or exempt from disclosure or certain types of use under applicable law. This information is for the sole use of the intended recipient(s). If you are not the intended recipient(s) or the employee or agent responsible for delivery of this message to the intended recipient(s), you are hereby notified that any review, use, disclosure, copying, distribution or the taking of any action in reliance on the contents of this e-mail or any attachments is strictly prohibited. You are further advised that review by an individual other than the intended recipient(s) shall not constitute a waiver of any attorney-client privilege which may apply to this communication. If you have received this communication in error, please notify the sender immediately by return e-mail, permanently delete this e-mail and any attachments from all computers on which they may be stored and destroy any print-outs of this email and any attachments.

---

**From:** Michael Ritorto  
**Sent:** Monday, May 15, 2017 12:36 PM  
**To:** [Cirian.Mike@epa.gov](mailto:Cirian.Mike@epa.gov)  
**Cc:** Dewitt, Lisa <[lidewitt@mt.gov](mailto:lidewitt@mt.gov)>; 'Emilsson, Gunnar' <[EmilssonGR@cdmsmith.com](mailto:EmilssonGR@cdmsmith.com)>; Andrew Baris ([abaris@rouxinc.com](mailto:abaris@rouxinc.com)) <[abaris@rouxinc.com](mailto:abaris@rouxinc.com)>; Laura Jensen <[ljensen@rouxinc.com](mailto:ljensen@rouxinc.com)>; [John.Stroiazso@glencore-ca.com](mailto:John.Stroiazso@glencore-ca.com); [swright@cfaluminum.com](mailto:swright@cfaluminum.com)  
**Subject:** CFAC Concrete Sampling Data

Mike,

As discussed on our call today, I am providing results from the concrete sampling in pot room #1. The two tables labeled "validated" are the samples that were collected originally in accordance with the Concrete SAP. The two "unvalidated" sets of data are the results from the recent additional sampling that was completed in accordance with the Concrete SAP modification. I have also attached a map showing the locations where the samples were collected in pot room #1.

A formal letter outlining our proposed path forward will follow.

**Michael Ritorto | Principal Hydrogeologist/Office Manager | Roux Associates, Inc.**

209 Shafter Street, Islandia, NY 11749

Main: 631-232-2600 | Direct: 631-630-2370

Email: [mrirtorto@rouxinc.com](mailto:mrirtorto@rouxinc.com) | Website: [www.rouxinc.com](http://www.rouxinc.com)



***Environmental Consulting  
& Management***

*We solve our clients' most challenging environmental problems*

NOTICE: This electronic communication, including any authorized attachments, contains information that may be legally privileged, protected, confidential and/or exempt from disclosure or certain types of use under applicable law. This information is for the sole use of the intended recipient(s). If you are not the intended recipient(s) or the employee or agent responsible for delivery of this message to the intended recipient(s), you are hereby notified that any review, use, disclosure, copying, distribution or the taking of any action in reliance on the contents of this e-mail or any attachments is strictly prohibited. You are further advised that review by an individual other than the intended recipient(s) shall not constitute a waiver of any attorney-client privilege which may apply to this communication. If you have received this communication in error, please notify the sender immediately by return e-mail, permanently delete this e-mail and any attachments from all computers on which they may be stored and destroy any print-outs of this email and any attachments.